

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

: No. 3:17-CR- 324

v.

FAIZAL BHIMANI and

OM SRI SAI, INC.,

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

FILED  
SCRANTON  
OCT 24 2017  
PER  
CLERK

COUNT ONE

Sex Trafficking by Force and Coercion

18 U.S.C. §§ 2; 1591(a)(1), (a)(2), and (b)(1)

From in or about June 2014, to the date of this Indictment, in the Middle District of Pennsylvania and elsewhere, the defendants,

**FAIZAL BHIMANI and  
OM SRI SAI, INC.,**

did knowingly recruit, entice, harbor, transport, provide, patronize, solicit, maintain, and obtain multiple victims by any means in and affecting interstate commerce, and did benefit financially and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained by any means in and affecting interstate or foreign commerce, multiple

victims, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause multiple victims to engage in commercial sex acts, and aided and abetted same.

All in violation of Title 18, United States Code, Sections 2 and 1591(a)(1), (a)(2), and (b)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

Sex Trafficking by Force and Coercion Conspiracy  
18 U.S.C. § 1594(c)

From in or about June 2014, to the date of this Indictment, in the Middle District of Pennsylvania, the defendant,

**FAIZAL BHIMANI, and  
OM SRI SAI, INC.,**

conspired with one or more other persons, known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, patronize, solicit, obtain, and maintained by any means in and affecting interstate or foreign commerce, and to benefit financially and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained by any means in and affecting interstate or foreign commerce, multiple victims, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause multiple victims to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1594(c) and 1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT THREE  
Drug Trafficking Conspiracy  
21 U.S.C. § 846

From in or about June 2014, and continuing to the date of this Indictment, in the Middle District of Pennsylvania, the defendants,

FAIZAL BHIMANI and  
OM SRI SAI, INC.,

knowingly and intentionally combined, conspired, confederated and agreed with other persons known and unknown to the Grand Jury, to commit the following offense(s) against the United States: to distribute and possess with intent to distribute cocaine, a Schedule II narcotic controlled substance; cocaine base, a Schedule II narcotic controlled substance; heroin, a Schedule I narcotic controlled substance; and marijuana, a Schedule I controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT FOUR**  
Managing a Drug Premises  
21 U.S.C. § 856(a)(2)

From in or about June 2014, to the date of this Indictment, in the Middle District of Pennsylvania, the defendants,

**FAIZAL BHIMANI and  
OM SRI SAI, INC.,**

did unlawfully and knowingly manage and control a hotel located in Bartonsville, Monroe County, Pennsylvania, as an owner, agent, employee, and occupant, and did knowingly and intentionally rent, lease, profit from, and make available for use said place for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1594(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461.

2. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1594(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Sections 371 and 1591 and Title 21, United States Code, Section 846, the defendants, Faizal Bhimani and Om Sri Sai, Inc., shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

a. All property, tangible and intangible, owned by OM SRI SAI, Inc., including but not limited to any bank accounts, accounts receivable, franchise agreements, and any other

asset;

- b. Real property located at 1779 North 9th Street, Bartonsville, PA 18321 consisting of the following parcel numbers 17/17/1/62-2 (a/k/a PIN 17638100428846), 17/17/1/62-1 (a/k/a PIN 17638100429707), 17/17/1/11-1 (a/k/a PIN 17638100438111), 17/17/1/61-2 (a/k/a PIN 17638100521795), 17/17/1/61-1 (a/k/a PIN 17638100523561), and 17/17/1/62 (a/k/a PIN 17638100531001), owner of record OM SRI SAI Inc.; and
- c. Pennsylvania Liquor Control Board Liquor License Registration No. 46359, licensee OM SRI SAI Inc.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

[REDACTED]  
FOREPERSON

Date: 10-24-17

BRUCE D. BRANDLER  
United States Attorney

By:

  
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SEAN A. CAMONI  
Assistant United States Attorney